



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AFM  
F. #2018R01047

*271 Cadman Plaza East  
Brooklyn, New York 11201*

November 18, 2020

By Email

Kenneth J. Kaplan  
Law Offices of Kenneth J. Kaplan, P.C.  
767 Third Avenue, 26th Floor  
New York, NY 10017

Re: United States v. Jack Cabasso, et al.  
Criminal Docket No. 19-CR-582 (DRH)

Dear Mr. Kaplan:

Pursuant to Rule 16(a)(1)(E)(iii) of the Federal Rules of Criminal Procedure, and subject to the terms of the Protective Order entered by the Court on May 29, 2020, the government hereby furnishes discovery with respect to the above-referenced matter, consisting of images and extractions of your client's electronic devices. Those devices are specified in the left-hand column of the table below using their "1B" evidence numbers, which correspond to the data in the applicable rows of the spreadsheet that was produced to you on October 16, 2020 with Bates number AVENTURA\_0000081309.

This production excludes items 1B8 and 1B32, which have not yet been extracted because they are encrypted.

Description	Bates Number
Image of item 1B6	FCABASSO_000001
Image of item 1B7	FCABASSO_000002
Extraction of item 1B30	FCABASSO_000003
Extraction of item 1B36	FCABASSO_000004
Extraction of item 1B45	FCABASSO_000005

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

SETH D. DUCHARME  
Acting United States Attorney

By:                     /s/                      
Ian C. Richardson  
Alexander Mindlin  
Kayla Bensing  
Assistant U.S. Attorneys  
(718) 254-6299/6433/6279

Enclosure (FCABASSO\_000001- FCABASSO\_000005)

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)